

AE

**JANUARY 10, 2008**MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT**RECEIVED**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NOV 14 2007

NOV 14 2007

MICHAEL W. DOBBINS  
CLERK, U. S. DISTRICT COURTDiane M. Dillon-Phillips

(Name of the plaintiff or plaintiffs)

CIVIL ACTION

v.  
Thresholds Psychiatric  
Rehabilitation Center07CV6461  
JUDGE COAR  
MAGISTRATE JUDGE MASON

(Name of the defendant or defendants)

**COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.

2. The plaintiff is Diane M. Dillon Phillips of the county of Cook in the state of Illinois.3. The defendant is Thresholds Psychiatric Rehabilitation Center, whose street address is 4101 N. Ravenswood,(city) Chicago (county) Cook (state) Illinois (ZIP) 60643(Defendant's telephone number) (773) 572-5500

II The plaintiff sought employment or was employed by the defendant at (street address)

4101 N. Ravenswood (city) Chicago(county) Cook (state) IL (ZIP code) 60643

5. The plaintiff [check one box]

- (a)  was denied employment by the defendant.  
(b)  was hired and is still employed by the defendant.  
(c)  was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) April, (day) 24, (year) 2007

**7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)**

- (a) The defendant is not a federal governmental agency, and the plaintiff [check one box]  has  no has filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

(i)  the United States Equal Employment Opportunity Commission, on or about (month) October (day) 11 (year) 2007

(ii)  the Illinois Department of Human Rights, on or about (month) April (day) 27 (year) 2007

(b) If charges were filed with an agency indicated above, a copy of the charge is attached.  YES.  NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

**7.2 The defendant is a federal governmental agency, and**

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

Yes (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_

No, did not file Complaint of Employment Discrimination

2. The plaintiff received a Final Agency Decision on (month) \_\_\_\_\_

(day) \_\_\_\_\_ (year) \_\_\_\_\_.

c. Attached is a copy of the

a. Complaint of Employment Discrimination,

YES  NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

YES  NO, but a copy will be filed within 14 days.

8. (*Complete paragraph 8 only if defendant is not a federal governmental agency.*)
- (a)  the United States Equal Employment Opportunity Commission has not issued a  
*Notice of Right to Sue.*
- (b)  the United States Equal Employment Opportunity Commission has issued a  
*Notice of Right to Sue*, which was received by the plaintiff on  
(month) October (day) 12 (year) 2007 a copy of which *Notice* is attached to this complaint.
9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:
- (a)  Age (Age Discrimination Employment Act).
- (b)  Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c)  Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d)  National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e)  Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f)  Religion (Title VII of the Civil Rights Act of 1964)
- (g)  Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a)  failed to hire the plaintiff.
- (b)  terminated the plaintiff's employment.
- (c)  failed to promote the plaintiff.

- (d)  failed to reasonably accommodate the plaintiff's religion.
- (e)  failed to reasonably accommodate the plaintiff's disabilities.
- (f)  failed to stop harassment;
- (g)  retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h)  other (specify): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. The facts supporting the plaintiff's claim of discrimination are as follows:

*See "CHARGE OF DISCRIMINATION"  
FORM 5-ILLINOIS DEPARTMENT OF  
HUMAN RIGHTS DATE 4/27/07.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

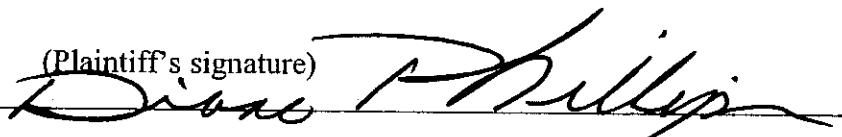
15. The plaintiff demands that the case be tried by a jury.  YES  NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff  
[check only those that apply]

- (a)  Direct the defendant to hire the plaintiff.
- (b)  Direct the defendant to re-employ the plaintiff.
- (c)  Direct the defendant to promote the plaintiff.
- (d)  Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e)  Direct the defendant to reasonably accommodate the plaintiff's disabilities.

- (f)  Direct the defendant to (specify): TO CONTRACT WITH THE PLAINTIFF TO CONDUCT "DIVERSITY TRAINING" TO ALL THREE HEDPS PSYCHIATRIC REHABILITATION CENTERS EMPLOYEES & MUSIINGA/1 EXECUTIVES
- (g)  If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h)  Grant such other relief as the Court may find appropriate.

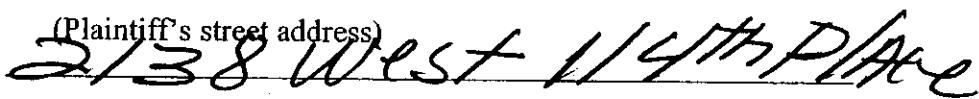
(Plaintiff's signature)



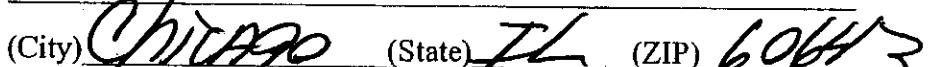
(Plaintiff's name)



(Plaintiff's street address)



(City)



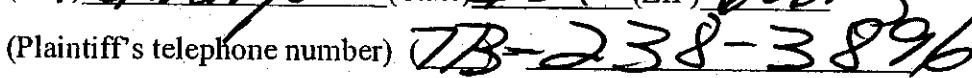
(State)



(ZIP)



(Plaintiff's telephone number)



Date:



## LOCAL RULES 5.2 — 5.4

### LR5.2. Form of Papers Filed

- (a) PAPER AND FONT SIZE. Each document filed shall be flat and unfolded on opaque, unglazed, white paper approximately 8 ½ x 11 inches in size. It shall be plainly written, or typed, or printed, or prepared by means of a duplicating process, without erasures or interlineations which materially deface it. It shall be bound or secured on the top edge of the document. Where the document is typed, line spacing will be at least 1½ lines. Where it is typed or printed, (1) the size of the type in the body of the text shall be 12 points and that in footnotes, no less than 11 points, and (2) the margins, left-hand, right-hand, top, and bottom, shall each be 1 inch.

**NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)**

To: Diane M. Dillon-Phillips  
2138 W 114th Place  
Chicago, IL 60643

From: Chicago District Office  
500 West Madison St  
Suite 2800  
Chicago, IL 60661

On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

21B-2007-01477

**Armernola P. Smith,  
State & Local Coordinator**

(312) 886-5973

(See also the additional information enclosed with this form.)

**NOTICE TO THE PERSON AGGRIEVED:**

**Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA):** This is your Notice of Right to Sue, issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA must be filed in a federal or state court **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

- More than 180 days have passed since the filing of this charge.
- Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.
- The EEOC is terminating its processing of this charge.
- The EEOC will continue to process this charge.

**Age Discrimination in Employment Act (ADEA):** You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal or state court **WITHIN 90 DAYS** of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.
- The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

**Equal Pay Act (EPA):** You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

*John P. Rowe*

Enclosures(s)

**John P. Rowe,  
District Director**

10/12/07

(Date Mailed)

cc: **THRESHOLDS PSYCHIATRIC**

### PRIVATE SUIT RIGHTS:

This issuance of this Notice of Right to Sue ends EEOC's process with respect to your charge. You may file a lawsuit against the respondent named in your charge within 90 days from the date you receive this Notice. Therefore you should keep a record of this date. Once this 90-day period is over, your right to sue is lost. If you intend to consult an attorney, you should do so as soon as possible. Furthermore, in order to avoid any question that you did not act in a timely manner, if you intend to sue on your own behalf, your suit should be filed well in advance of the expiration of the 90-day period.

You may file your lawsuit in a court of competent jurisdiction. Filing this Notice is not sufficient. A court complaint must contain a short statement of the facts of your case which shows that you are entitled to relief. Generally, suits are brought in the state where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office.

You may contact EEOC if you have any questions about your rights, including advice on which court can hear your case, or if you need to inspect and copy information contained in the case file.

A lawsuit against a **private employer** is generally filed in the U.S. District Court.

A lawsuit under Title VII of the Civil Rights Act of 1964, as amended, against a **State agency or a political subdivision of the State** is also generally filed in the U.S. District Court.

However, a lawsuit under the Age Discrimination in Employment Act or the Americans with Disabilities Act or, probably, the Equal Pay Act against a **State instrumentality** (an agency directly funded and controlled by the State) **can only be filed in a State court**.

A lawsuit under the Age Discrimination in Employment Act or the Americans with Disabilities Act or the Equal Pay Act against a **political subdivision of the State**, such as municipalities and counties, may be filed in the U.S. District Court.

For a list of U.S. District Courts, please see reverse side.

**IF THE FIRST THREE CHARACTERS OF YOUR EEOC CHARGE NUMBER ARE "21B" AND YOUR CHARGE WAS INVESTIGATED BY THE ILLINOIS DEPARTMENT OF HUMAN RIGHTS (IDHR), REQUEST FOR REVIEWING AND COPYING DOCUMENTS FROM YOUR FILE MUST BE DIRECTED TO IDHR.**

### ATTORNEY REPRESENTATION:

If you cannot afford or have been unable to obtain a lawyer to represent you, the court having jurisdiction in your case may, assist you in obtaining a lawyer. If you plan to ask the court to help you obtain a lawyer, you must make this request of the court in the form and manner it requires. Your request to the court should be made well before the end of the 90-day period mentioned above. A request for representation does not relieve you of the obligation to file a lawsuit within this 90-day period.

### DESTRUCTION OF FILE:

If you file suit, you or your attorney should forward a copy of your court complaint to this office. Your file will then be preserved. Unless you have notified us that you have filed suit, your charge file could be destroyed as early as six months after the date of the Notice of Right to Sue.

**IF YOU FILE SUIT, YOU OR YOUR ATTORNEY SHOULD NOTIFY THIS OFFICE WHEN THE LAWSUIT IS RESOLVED.**

You have been notified of your right to file suit in Federal District Court. Suit is ordinarily filed in the District Court having jurisdiction of the county in which the employer, against whom you filed a charge of employment discrimination, is located. The telephone number listed for each District is that of the Clerk of the Court.

**U.S. District Court**  
**Northern District of Illinois**  
**Eastern Division at Chicago**  
**219 South Dearborn Street**  
**Chicago, Illinois 60604**  
**312/435-5670**

**U.S. District Court**  
**Central District of Illinois**  
**Danville/Urbana Division**  
**201 North Vermilion**  
**Danville, Illinois 61832**  
**217/431-4805**

Counties

Cook	Kendall
DuPage	Lake
Grundy	LaSalle
Kane	Will

and

**201 South Vine**  
**218 U.S. Courthouse**  
**Urbana, Illinois 61801**  
**217/373-5830**

**U.S. District Court**  
**Northern District of Illinois**  
**Western Division at Rockford**  
**211 South Court Street**  
**Federal Building**  
**Rockford, Illinois 61101**  
**815/987-4355**

Counties

Champaign	Kankakee
Coles	Macon
Douglas	Moultrie
Edgar	Piatt
Ford	Vermilion
Iroquois	

Counties

Boone	McHenry
Carroll	Ogle
DeKalb	Stephenson
JoDaviss	Whiteside
Lee	Winnebago

**U.S. District Court**  
**Southern District of Illinois**  
**750 Missouri Avenue**  
**East St. Louis, Illinois 62201**  
**618/482-9370**

and

**301 West Main Street**  
**Benton, Illinois 62812**  
**618/438-0671**

Counties

Alexander	Johnson
Bond	Lawrence
Calhoun	Madison
Clark	Marion
Clay	Massac
Clinton	Monroe
Crawford	Perry
Cumberland	Pope
Edwards	Pulaski
Effingham	Randolph
Fayette	Richland
Franklin	St. Clair
Gallatin	Saline
Hamilton	Union
Hardin	Wabash
Jackson	Washington
Jasper	Wayne
Jefferson	White
Jersey	Williamson

Counties

Bureau	McLean
Fulton	Peoria
Hancock	Putnam
Knox	Stark
Livingston	Tazewell
Marshall	Woodford
McDonough	

Rock Island Division

**211 - 19th Street**  
**Rock Island, Illinois 61201**  
**309/793-5778**

Counties

Henderson	Rock Island
Henry	Warren
Mercer	

Springfield Division

**600 East Monroe Street**  
**Springfield, Illinois 62701**  
**217/492-4020**

Counties

Adams	Logan	Pike
Brown	Macoupin	Sangamon
Cass	Mason	Schuylerville
Christian	Menard	Scott
DeWitt	Montgomery	Shelby
Greene	Morgan	

ILLINOIS DEPARTMENT OF  
**Human Rights**

Rod R. Blagojevich, Governor  
Rocco J. Claps, Director

Equal Employment Opportunity Commission 2007  
500 West Madison  
28th Floor  
Chicago, Illinois 60605

OCT 11 2007

REC'D - EEOC

ATTN: State and Local Unit

I am withdrawing Charge Number 2007CA2813 from the Illinois Department of Human Rights and hereby request a Right to Sue Notice from EEOC on the following charge:

EEOC Number: 21BA71477

Complainant: Diane M. Dillon-Phillips

Respondent: Thresholds Psychiatric Rehabilitation Centers

Complainant's Signature Diane Phillips

Date 10/11/07

#6B  
11/93

Rod R. Blagojevich, Governor  
Rocco J. Claps, Director

June 19, 2007

Diane M. Dillon-Phillips  
2138 W. 114<sup>th</sup> Place  
Chicago, Ill 60643

RE: Charge Number 2007CA2813  
Complainant – Diane M. Dillon-Phillips  
Respondent – Thresholds Psychiatric Rehabilitation Centers

Dear Ms. Dillon-Phillips,

Pursuant to your recent conversation you requested the right to sue notice from the EEOC. Enclosed is an official Voluntary Withdrawal Request Form, which will expedite the dismissal of your charge. Also enclosed is a request for the right to sue notice. I would appreciate it if you would sign the enclosures and return them to my attention immediately.

If you have changed your mind about withdrawing your charge, please contact me immediately at (312) 814-4310 so I can take appropriate action to proceed with your case.

Thank you for your cooperation.

Sincerely,



Sue Sakurai  
Human Rights Investigator  
Investigations Section

#6d  
11/06

ILLINOIS DEPARTMENT OF  
**Human Rights**

Rod R. Blagojevich, Governor  
Rocco J. Claps, Director

**May 2, 2007**

**Diane M Dillon-Phillips  
2138 W 114<sup>th</sup> Place  
Chicago, Illinois 60643**

**Charge No. : 2007CA2813  
Respondent: Thresholds Psychiatric Rehabilitation Center  
Complaint Filing Dates: 04/27/07 thru 05/27/07**

**Dear Complainant:**

You have filed a discrimination charge under the Human Rights Act. **A copy of the charge has been served on the Respondent.** Keep this letter, have it with you if you need to telephone or come to the Department (DHR). If there is an "A", "E" or "F" in your charge number, we are enclosing an important notice from the Federal Equal Employment Opportunity Commission because your charge has been automatically filed with that agency as well.

**When a fact-finding conference is scheduled, you will be advised of the date.** It is your responsibility to cooperate with the Department's investigation and provide all pertinent information you have concerning the case by the dates requested.

You have the right to file a complaint with the Human Rights Commission if the Department of Human Rights (DHR) has not completed your case (either by filing a complaint with the Commission or issuing a notice of dismissal) within 365 days from the date you filed your PERFECTED signed and notarized charge or within any extension of that time to which you and the Respondent have agreed in writing.

Your complaint must be filed within 30 days of the expiration of 365 days or extension (see above paragraph). We have calculated the time above (see Complaint Filing Dates). While we have made this calculation with the best of intentions, errors can occur. The Commission has ruled that it is your responsibility to count the number of days properly. If you file a complaint outside this 30-day period, the Commission may dismiss your complaint.

**100 West Randolph Street, James R. Thompson Center, Suite 10-100, Chicago, Illinois 60601, 312-814-6200, 312-263-1579 (TDD)**

Once 395 days (or the extended time) have passed, DHR must dismiss your charge with prejudice without any further right to proceed if you have not filed a complaint with the Commission. Therefore, you may wish to contact an attorney to decide the best way for you to handle your case. If you file a complaint, the form of the complaint must be in accordance with Section 7A-102(F) of the Human Rights Act. You must serve a copy of the complaint on DHR, on the same day that you file a complaint with the Commission. The Commission will then schedule a hearing for your case before an Administrative Law Judge.

**You must advise DHR of all changes of name, address or telephone numbers. If you do not do so, DHR may dismiss your case if it cannot locate you.**

**IN-6 NON-MED  
REV. 06/03**



**U.S EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

**Chicago District Office**

500 West Madison St., Suite 2800

Chicago, IL 60661-2511

PH: (312) 353-2713

TDD: (312) 353-2421

ENFORCEMENT FAX: (312) 886-1168

LEGAL FAX: (312) 353-8555

**IMPORTANT NOTICE. PLEASE READ CAREFULLY. KEEP THIS  
NOTICE WITH YOUR OTHER RECORDS OF THIS CHARGE.  
THIS MAY BE THE ONLY NOTIFICATION FROM EEOC.**

**IDHR CHARGE NUMBER: 2007CA2813 DILLON-PHILLIPS DIANE M**

**EEOC NOTICE OF CHARGE FILED**

You are filing a charge of employment discrimination with the Illinois Department of Human Rights (IDHR).

As a result of an agreement between the Illinois Department of Human Rights (IDHR) and the U. S. Equal Employment Opportunity Commission (EEOC), the EEOC will also receive for filing the subject charge of discrimination.

You are encouraged to cooperate with the IDHR in the investigation of your charge. The final findings and orders of that agency may be adopted by the EEOC.

The IDHR will process your charge. Under Section 1601.76 of EEOC's regulations, you are entitled to request that EEOC review the IDHR's investigation and findings. To obtain this review, you must request it by writing to this office within 15 days of your receipt of the IDHR's final findings of your case. If we do not receive such a request for a review, EEOC will likely accept the IDHR's findings without any review or any other processing by EEOC.

EEOC regulations require that you notify us of any change in address and keep us informed of any prolonged absence from your current address. Your cooperation in this matter is essential.

***PLEASE NOTE: BUILDING SECURITY PROCEDURES PRESENTLY IN PLACE  
DO NOT PERMIT ACCESS TO EEOC WITHOUT AN APPOINTMENT. IF AN  
APPOINTMENT IS REQUIRED, CALL (312) 353-2713 OR 1-800-669-4000.***

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.

07W0425.10A

AGENCY

 IDHR EEOC

CHARGE NUMBER

2007CA2813

**Illinois Department of Human Rights and EEOC**

NAME (indicate Mr. Ms. Mrs.)

Diane M. Dillon Phillips

HOME TELEPHONE (include area code)

(773) 238-3896

STREET ADDRESS

2138 W. 114<sup>th</sup> Place

CITY, STATE AND ZIP CODE

Chicago, IL 60643

DATE OF BIRTH

04/03/55

**NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)**

NAME

Thresholds Psychiatric  
Rehabilitation Centers

NUMBER OF EMPLOYEES,

MEMBERS 15+

TELEPHONE (include area code)

(773) 572-5500

STREET ADDRESS

4101 N. Ravenswood

CITY, STATE AND ZIP CODE

Chicago, IL 60613

COUNTY

Cook

CAUSE OF DISCRIMINATION BASED ON:

Race    Age    Mental Handicap    Sex    Religion

DATE OF DISCRIMINATION  
EARLIEST (ADEA/EPA) LATEST (ALL)

04/24/07

 CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed attach extra sheets)

**I. A. ISSUE/BASIS**

FINAL WRITTEN REPRIMAND – MARCH 26, 2007, DUE TO MY RACE, BLACK

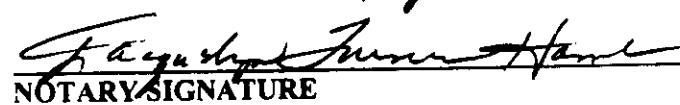
**B. PRIMA FACIE ALLEGATIONS**

1. My race is black.
2. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
3. On March 26, 2007, I was issued a final written warning by Patricia Biggs (white), Program Director for Young Adults Program. The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.

(Continued)

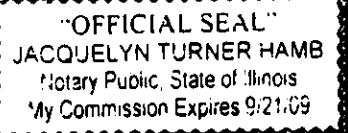
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME ON

THIS 27 DAY OF April, 2007
  
 NOTARY SIGNATURE

  
 DATE  
 4/27/07  
 SIGNATURE OF COMPLAINANT

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief



NOTARY SEAL

**Complainant: Diane M. Dillon Phillips**

**Charge Number: 2007CA2813**

**Page 2**

4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-black subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not issued a final written reprimand.

**II. A. ISSUE/BASIS**

**FINAL WRITTEN REPRIMAND – MARCH 26, 2007, DUE TO MY SEX,  
FEMALE**

**B. PRIMA FACIE ALLEGATIONS**

1. My sex is female.
2. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
3. On March 26, 2007, I was issued a final written warning by Patricia Biggs (female), Program Director for Young Adults Program. The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.
4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a male subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not issued a final written reprimand.

**III. A. ISSUE/BASIS**

**FINAL WRITTEN REPRIMAND – MARCH 26, 2007, DUE TO MY AGE, 55**

**B. PRIMA FACIE ALLEGATIONS**

1. I am 55 years old.
2. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
3. On March 26, 2007, I was issued a final written warning by Patricia Biggs (50's), Program Director for Young Adults Program. The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.
4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a younger subordinate of mine, Garrett Raubolt (29), with the same conduct toward me, however he was not issued a final written reprimand.

**(Continued)**

Complainant: Diane M. Dillon Phillips

Charge Number: 2007CA2813

Page 3

**IV. A. ISSUE/BASIS**

**FINAL WRITTEN REPRIMAND – MARCH 26, 2007, DUE TO MY RELIGION, CHRISTIAN**

**B. PRIMA FACIE ALLEGATIONS**

1. My religious beliefs are sincere.
2. Respondent was aware of my religious beliefs.
3. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
4. On March 26, 2007, I was issued a final written warning by Patricia Biggs (religious beliefs unknown), Program Director for Young Adults Program. The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.
5. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-Christian subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not issued a final written reprimand.

**V. A. ISSUE/BASIS**

**DISCHARGE – APRIL 24, 2007, DUE TO MY RACE, BLACK**

**B. PRIMA FACIE ALLEGATIONS**

1. My race is black.
2. My work performance as Assistant Program Director for Young Adult Program met Respondent's expectations. I was hired on October 23, 2006.
3. On April 24, 2007, I was discharged by Patricia Biggs (white), Program Director for Young Adult Programs. The reason cited for the discharge was for alleged inappropriate and unprofessional conduct.
4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-black subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not discharged.

**VI. A. ISSUE/BASIS**

**DISCHARGE – APRIL 24, 2007, DUE TO MY SEX, FEMALE**

**B. PRIMA FACIE ALLEGATIONS**

1. My sex is female.

(Continued)

**Complainant: Diane M. Dillon Phillips**

**Charge Number: 2007CA2813**

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**XI. A. ISSUE/BASIS**

**DISCHARGE - APRIL 24, 2007, DUE TO MY MENTAL HANDICAP,  
ANXIETY DISORDER**

**B. PRIMA FACIE ALLEGATIONS**

- 1. I am a handicapped individual within the meaning of Section 1-103 (I) of the Illinois Human Rights Act.**
- 2. Respondent was aware of my mental handicap.**
- 3. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.**
- 4. On April 24, 2007, I was discharged by Patricia Biggs, Program Director for Young Adults Program. The reasons cited for the discharge reprimand were alleged inappropriate and unprofessional conduct.**
- 5. I vehemently deny that I engaged in either forms of misconduct. Moreover, I charged a non-handicapped subordinate of mine, Garrett Raubolt, with the same conduct toward me, but he was not discharged.**
- 6. My condition is unrelated to my ability to perform the essential functions of my job duties as an assistant program director for young adult programs.**

**X. A. ISSUE/BASIS**

**DISCHARGE – APRIL 24, 2007, DUE TO MY MENTAL HANDICAP,  
POST TRAUMATIC SYNDROME DISORDER**

**B. PRIMA FACIE ALLEGATIONS**

- 1. I am a handicapped individual within the meaning of Section 1-103 (I) of the Illinois Human Rights Act.**
- 2. Respondent was aware of my mental handicap.**
- 3. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.**
- 4. On April 24, 2007, I was discharged by Patricia Biggs, Program Director for Young Adults Program. The reasons cited for the discharge were alleged inappropriate and unprofessional conduct.**
- 5. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-handicapped subordinate of mine, Garrett Raubolt, with the same conduct toward me, but he was not discharged.**